

**Exhibit A**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION - AKRON**

In re:	)	Case No. 10-52334
	)	
ANDRE L. ROBINS and	)	Chapter 7
LADONNA R. ROBINS	)	
	)	
Debtors.	)	Chief Judge Marilyn Shea-Stonum

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**STIPULATION THAT DEBT DUE AND OWING TO THE STATE OF OHIO,  
DEPARTMENT OF JOB AND FAMILY SERVICES IS NONDISCHARGEABLE**

By agreement between the State of Ohio, Department of Job and Family Services (“ODJFS”) and the Debtor, LaDonna R. Robbins aka LaDonna R. Prude-Robins (“Debtor”), ODJFS and Debtor hereby stipulate to the following;

1. This is a core proceeding over which this Court has jurisdiction pursuant to 28 U.S.C. §§157(b)(2) and 1334.
2. On or about May 17, 2010, the Debtor filed a Petition jointly with her husband, Andre L. Robins, under Chapter 7 of the United States Bankruptcy Code for the liquidation of their assets and the discharge of their debts.
3. Beginning on or about December 30, 2007 through on or about March 15, 2008 (“the UC Period”) Debtor applied for and received unemployment compensation benefits from or through ODJFS pursuant to O.R.C. §4141.01, et seq.
4. During the UC Period, Debtor was employed at Akron General Medical Center, Inc.
5. During the UC Period, Debtor filed applications with ODJFS for unemployment compensation, was required to disclose any and all employment during such period, did not disclose to ODJFS that she was employed at Akron General Medical Center, Inc. and received unemployment compensation benefits in the amount of Two Thousand, Six

Hundred Forty and 00/100 Dollars from ODJFS relative to the UC Period to which she was not entitled (the "UC Benefits"). Debtor has not repaid any of said amounts to ODJFS and presently owes said principal amount plus additional charges.

6. The unemployment compensation the Debtor received to which she was not entitled under Ohio and Federal law are not dischargeable pursuant to 11 U.S.C. §523(a)(2)(A) (false pretenses, false representation, or actual fraud) and §523(a)(7) (fine payable to and for the benefit of a governmental unit).
7. There is due ODJFS from the Debtor for overpayment of unemployment compensation benefits which the Debtor obtained through fraud the principal sum of Two Thousand Six Hundred Forty and 00/100 Dollars (\$2,640.00) as of the date of the filing of the bankruptcy petition.
8. Interest pursuant to O.R.C. § 4121.35 and 4141.23 (B)(2) and collection fees pursuant to O.R.C. § 131.02 continue to accrue on the unpaid UC Benefits until paid.
9. The parties stipulate and agree that the Court shall enter an order awarding a judgment in favor of ODJFS against LaDonna R. Robins aka LaDonna R. Prude-Robins in the principal amount of Two Thousand Six Hundred Forty and 00/100 Dollars (\$2,640.00) plus interest at the statutory rate of fourteen percent (14%) per year compounded monthly pursuant to O.R.C. §§ 4141.35 and 4141.23 (B)(2) and statutory collection fees of eleven percent (11.0%) per annum pursuant to O.R.C. § 131.02, and declaring that the UC Benefits, interest and collection fees are not dischargeable and are excepted from discharge.
10. The Debtor may satisfy her obligation to repay ODJFS the UC Benefits plus the interest and collection fees described above by paying to ODJFS the total sum of \$3,000.00 in fifteen consecutive monthly payments of at least \$200.00 due and payable on the fifteenth

day of each month beginning December 15, 2010 and continuing thereafter for fourteen additional consecutive months; The entire amount outstanding at any time may be paid without penalty prior to the date upon which such payment(s) are due; Payments due on a Saturday, Sunday or legal holiday shall be due the immediately following day on which banks and government offices are open to conduct regular business; If the Debtor fails to make any of the fifteen payments provided for hereunder, if any payment is not honored by the Debtor's financial institution or if for any other reason ODJFS does not receive a payment in a timely manner, the full amount of principal then due and owing together with all interest and collections fees that would have been owed but for this Stipulation and Agreement, less all sums received from Debtor prior to the default, shall become due and payable immediately without further notice to Debtor or her attorney and interest and collection fees shall continue to accrue and be charged until the debt is paid in full.

11. If the debtor successfully pays each and every monthly payment as set forth in paragraph 10 above in a timely manner (total of \$3,000.00), the debt to ODJFS described above shall be deemed to have been repaid as that term is used in O.R.C. § 4141.35(A)(3). All of the provisions set forth O.R.C. § 4141.35 shall continue to apply.
12. The debt to ODJFS described above and resolved hereby relates only to Debtor, LaDonna R. Robins, aka LaDonna R. Prude-Robins.

Agreed and Submitted by:  
RICHARD CORDRAY  
Attorney General of Ohio

Agreed and Approved by:

/s/Donn D. Rosenblum  
DONN D. ROSENBLUM (OH# 0016552)  
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Attorney for Debtor

/s/ LaDonna R. Robins aka LaDonna R.  
Prude-Robins  
LaDonna R. Robins aka LaDonna R.  
Prude-Robins  
1943 Northgate Circle  
Akron, OH 44320-4229

#### CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Stipulation was served on the persons listed below by the means stated immediately beneath their respective addresses this 7<sup>th</sup> day of December, 2010.

Robert S. Thomas, II  
Chapter 7 Trustee  
One South Main Street – 2<sup>nd</sup> Floor  
Akron, OH 44308  
(Electronic Service – ECF)

/s/Donn D. Rosenblum  
Donn D. Rosenblum